

Appendix E
Status of Recommendations from
Prior 5-year Reviews

Status of Recommendations from Prior 5-year Reviews for Atlas and Coalinga Asbestos Mine (Johns-Manville Mill) Superfund Sites

PREPARED FOR: United States Environmental Protection Agency

PREPARED BY: Daisy Digmanese/CH2M HILL
Alexa Stamets/CH2M HILL

DATE: May 19, 2006

The purpose of this technical memorandum is to summarize the status of recommendations from prior 5-year reviews for the Atlas and Coalinga Asbestos Mine Superfund Sites in Fresno County, California. The previous (first) 5-year review for the Atlas Asbestos Mine Site was completed in 2001. The results of that review are documented in the *Final First Five-Year Review Report for Atlas Asbestos Mine Site* (USEPA 2001a). The previous (second) 5-year review for the Coalinga Asbestos Mine Site was completed in 2001. The results of that review are documented in the *Final Second Five-Year Review Report for Coalinga Asbestos Mine Superfund Site, Coalinga* (USEPA 2001b).

Site Background

The Atlas Asbestos Mine Superfund Site consists of two operable units (OU) and two geographic areas. The Coalinga Asbestos Mine Superfund Sites consists of two OUs. The Atlas Asbestos Mine Superfund Site consists of the Atlas Mine Area OU (OU1), City of Coalinga OU (OU2), the Clear Creek Management Area (CCMA), and the Arroyo Pasajero Ponding Basin (Ponding Basin). The CCMA and Ponding Basin geographic areas were previously evaluated with the Atlas Asbestos Mine Superfund Site because of concerns that asbestos mining and milling waste from the Atlas Mine Area were being transported to these areas by water or wind. The Coalinga Asbestos Mine Site consists of the Johns-Manville Mill (JMM) OU (OU1) and the previously mentioned City OU (OU2), which is considered part of the Coalinga Asbestos Mine Site due to historic operations.

This memorandum is organized into the following sections: Atlas Mine Area OU, JMM OU, and the City OU. Recommendations made in the previous 5-year review report and a summary of the status of those recommendations for each OU will also be discussed.

Atlas Mine Area OU

Recommendations identified for the Atlas Mine in the *Final First Five-Year Review Report for Atlas Asbestos Mine Site* (USEPA 2001a) include:

1. Repair road or find another route to access Pond A area.
2. Perform a study to determine the best means of addressing eroding soil at the erosion prone area near the Regional Sediment Storage Area.

3. Perform more frequent maintenance of revegetation site.
4. Place deed restrictions on property and develop Access Control Agreement.

The first two recommendations were largely addressed during the construction maintenance activities performed in the spring of 2005. Among other maintenance activities, the road to Pond A and the gullies on the outboard slope of the tailings pile south of the Regional Sediment Storage Area were repaired during 2005.

Two portions of the road to Pond A were addressed. Adjacent to the Pond B highwall, the road was repaired and re-graded to change the super-elevation to slope toward the drainage ditch. The drainage ditch was regraded and lined with Reno mattresses for stabilization. In the second location, berms were established at the existing diversion channel between the Pond B highwall and Pond A to prevent runoff to the road. These repairs will prevent surface water from further eroding the access roadway towards Pond A area. An alternate route to access Pond A, the second component of Recommendation 1, has not been identified.

At the outboard slope of the tailings pile south of the Regional Sediment Storage Area, four gullies were repaired in the following ways:

- Buttresses were placed on top of each of the gullies with rip rap underlain by filter fabric.
- A subsurface drain was constructed beneath the flow lines of each gully so water can exit after the velocity has been reduced by the rip rap energy dissipaters.
- Berms at the top of the tailings pile slope were constructed to direct surface water in the vicinity of the gullies toward the gullies.

These repairs were designed to prevent further erosion from occurring in the existing gullies and reduce the potential for additional gullies from forming.

Since the last 5-year review, Recommendation 3, more frequent maintenance of revegetation, was not performed. However, in an April 2002 e-mail to an Atlas Representative (George Robinson, R2 Inc.), Shea Jones, the United States Environmental Protection Agency (USEPA) remedial project manager (RPM) decided that further re-vegetation efforts would not be required. This decision was based on a consideration of the very limited success of the \$1.5 million revegetation pilot program. In June 2006, this decision was reaffirmed in a teleconference that included representatives of Northrop Grumman (Elizabeth Brown), Department of Toxic Substances Control (DTSC) (Steve Ross), Bureau of Land Management (Tim Moore), and USEPA (Lynn Suer, RPM). It was also decided that vegetation will continue to be monitored during inspections. If large disturbances to existing vegetation are observed (e.g. due to severe storms or earthquakes), re-vegetation efforts may be re-considered. Site inspections indicate that natural re-vegetation processes are occurring and these will likely provide a self-sustaining vegetative cover over the long term. The original re-vegetation effort was successful in that it provided the source material for these natural processes.

Recommendation 4 has not been implemented. DTSC has responsibility for this action, because the 1992 Consent Decree for the Atlas Mine Area OU does not require the settling

parties to record deed restrictions. DTSC is currently working with Northrop Grumman to develop the deed restriction for their privately owned property at the Atlas Mine Area.

Johns-Manville Mill OU

No recommendations or follow-up actions were specified for the JMM OU in the *Final Second Five-Year Review Report for Coalinga Asbestos Mine Superfund Site, Coalinga* (USEPA 2001b). No activities or changes in status have occurred at the site other than routine operation and maintenance activities.

City OU

Recommendations identified for the City OU in the *Final First Five-Year Review Report for Atlas Asbestos Mine Site* (USEPA 2001a) and the *Final Second Five-Year Review Report for Coalinga Asbestos Mine Superfund Site, Coalinga* (USEPA 2001b) include:

1. Repair animal burrows found at the Waste Management Unit (WMU) cap.
2. Repair damaged signs

Both recommendations were completed during regular operation and maintenance activities since the last 5-year review. In addition, in October 2005, fencing material with a smaller screen size was added to the lower 3 feet of the perimeter fence and extended approximately 3 feet below ground to prevent small animals from entering the site and burrowing into the cap of the WMU. Based on observations made during the most recent site inspection (2006), the additional fencing resulted in a decrease of the number of burrows found in the cap of the WMU.

References

- United States Environmental Protection Agency (USEPA). 2001a. *Final First Five-Year Review Report for Atlas Asbestos Mine Site*. September 28.
- _____. 2001b. *Final Second Five-Year Review Report for Coalinga Asbestos Mine Superfund Site, Coalinga*. September 27.

Appendix F

Documents Reviewed

APPENDIX F

Documents Reviewed

Bureau of Land Management (BLM). 2006a. Clear Creek Bulletin. May.

_____. 2006b. *2006 Clear Creek Management Area Resource Management Plan Amendment and Route Designation Record of Decision*. January.

California Department of Health Services. 1995. *Health Consultation Atlas/Coalinga Asbestos Mines City of Coalinga Operable Unit*.

Department of Water Resources (DWR). 2004. Sampling of Designated Borrow Areas For Naturally-Occurring Asbestos Sampling Report. May.

Ecology & Environment, Inc. (E&E). 1996. *Five-Year Review for the City of Coalinga OU of the Atlas and Coalinga Superfund Sites, Coalinga, CA*. April 26.

Environmental Strategies Corporation (ESC). 1999. *Remedial Action Completion Report For the Atlas Mine Superfund Site*. November 15.

GE Enterprises (GE). 2003. *Revised 2002 Inspection Report Atlas Mine Operable Unit Atlas Asbestos Mine Superfund Site*. February 10.

Levine Fricke (LFR). 2001. *Inspection Report for Engineering Systems, Johns-Manville Coalinga Mill Area Operable Unit*. March 30.

_____. 2001. *Inspection Report for Engineering Systems, Johns-Manville Coalinga Mill Area Operable Unit*. May 15.

_____. 2002a. *Revised Operations and Maintenance Plan, Johns-Manville Coalinga Mill Area Operable Unit*. May 2.

_____. 2002b. *Inspection Report for Engineering Systems, Johns-Manville Coalinga Mill Area Operable Unit*. May 3.

_____. 2003. *Inspection Report for Engineering Systems, Johns-Manville Coalinga Mill Area Operable Unit*. April 18.

_____. 2004a. *Inspection Report for Engineering Systems, Johns-Manville Coalinga Mill Area Operable Unit*. October 18.

_____. 2004b. *Inspection Report for Engineering Systems, Johns-Manville Coalinga Mill Area Operable Unit*. June 1.

_____. 2005. *Inspection Report for Engineering Systems, Johns-Manville Coalinga Mill Area Operable Unit*. June 6.

_____. 2006. *Inspection Report for Engineering Systems, Johns-Manville Coalinga Mill Area Operable Unit*. April 27.

Kennedy Jenks Consultants. 2001. *2001 Annual Visual Inspection Report Waste Management Unit Coalinga Asbestos Mine Landfill*. May 24.

_____. 2002. *2002 Annual Visual Inspection Report Waste Management Unit Coalinga Asbestos Mine Landfill*. June 17.

_____. 2003. *2003 Annual Visual Inspection Report Waste Management Unit Coalinga Asbestos Mine Landfill*. July 11.

_____. 2004. *2004 Annual Visual Inspection Report Waste Management Unit Coalinga Asbestos Mine Landfill*. October 12.

_____. 2005. *2005 Annual Visual Inspection Report Waste Management Unit Coalinga Asbestos Mine Landfill*. November 1.

R2 Incorporated (R2). 2005. *2005 Site Inspection Report Atlas Mine Operable Unit Atlas Asbestos Mine Superfund Site*. October.

_____. 2003. *Revised 2003 Site Inspection Report Atlas Mine Operable Unit Atlas Asbestos Mine Superfund Site*. December 19.

_____. 2004. *Work Plan Transmittal, 2004 Maintenance Repairs, Atlas Mine Operable Unit Atlas Asbestos Mine Superfund Site*. January 23.

_____. 2005. *Construction Completion Report, 2004 Maintenance Repairs, Atlas Mine Operable Unit Atlas Asbestos Mine Superfund Site*. November 14.

South Pacific Transportation Company. 1992. *Operations and Maintenance Plan Southern Pacific Transportation Company Waste Management Unit Coalinga Operable Unit*. January.

United States Department of the Interior (DOI), Bureau of Land Management. 1995. *Clear Creek Management Area Proposal Resource Management Plan Amendment and Final Environmental Impact Statement*. August.

U.S. Environmental Protection Agency (USEPA). 1989. *EPA Superfund Record of Decision – Coalinga Asbestos Mine OU #02*. July 19.

_____. 1990. *EPA Superfund Record of Decision – Coalinga Asbestos Mine OU #01*. September.

_____. 1991. *EPA Superfund Record of Decision – Atlas Asbestos Mine OU #01*. February.

_____. 1992. "Public Notice – Status of Clear Creek Management Area and Arroyo Pasajero Ponding Basin". December.

_____. 1997a. *Superfund Closeout Report for Coalinga Asbestos Mine Site*. August.

_____. 1997b. *Fact Sheet: EPA Announces Intent to Remove Coalinga Asbestos Mine from Superfund List*. November.

_____. 1999. *Preliminary Closeout Report for Atlas*. September.

- _____. 2001a. *Final Second Five-Year Review Report for Coalinga Asbestos Mine Site*. September.
- _____. 2001b. *Five-Year Review Report for Atlas Asbestos Mine Site*. September.
- _____. 2001c. *Fact Sheet: Five-Year Reviews Completed – Atlas and Coalinga Asbestos Mines Superfund Sites*. December.
- _____. 2004. *Fact Sheet: U.S. EPA to Conduct Risk Assessment at Clear Creek Management Area– Atlas Asbestos Mines Superfund Site*. August.
- _____. 2005. *Fact Sheet: U.S. EPA will collect Air Samples Before and During Racing Event – Atlas Asbestos Mines Superfund Site*. February.